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UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS & ELECTRIC COMPANY,

Debtors,

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

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Case No.: 19-30088-DM

Chapter 11

**JOINDER OF THE CITY AND
COUNTY OF SAN FRANCISCO TO
OPPOSITION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
TO MOTION OF DEBTORS
PURSUANT TO 11 USC §§105(a), 363
(b) AND 503(c) FOR ENTRY OF AN
ORDER (I) APPROVING DEBTOR'S
INCENTIVE PROGRAM FOR
CERTAIN KEY EMPLOYEES AND (II)
GRANTING RELATED RELIEF.**

DATE: July 24, 2019

TIME: 9:30 am

PLACE: Courtroom 17

450 Golden Gate Avenue, 16th Fl.
San Francisco, California

JUDGE: Hon. Dennis Montali

RELATED DOCKET NOS: 2664, 3030

1 The City and County of San Francisco ("San Francisco") in the above-captioned chapter 11
2 cases of Pacific Gas and Electric Company (the "Utility") and PG&E Corporation ("PG&E" and,
3 together with the Utility, the "Debtors"), hereby joins, as further described herein, in the Opposition
4 of the Official Committee of Tort Claimants (the "Tort Committee Opposition") [Docket No. 3030]
5 to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(A), 363 (b), and 503 (C) for Entry of Order (I)
6 Approving Debtor's Incentive Program for Certain Key Employees and (II) Granting Related Relief
7 [Dkt. No. 2664] (the "Motion").

8 San Francisco generally concurs with the Tort Committee Opposition filed herein and believes
9 that any Key Employee Incentive Plan should be limited. San Francisco files this joinder to preserve
10 its rights to object to the Motion on the specific grounds set forth herein. In support hereof, San
11 Francisco respectfully represents as follows:

12 JOINDER

13 San Francisco's interest in the Motion is both as a creditor and on behalf of the Utility's
14 ratepayers in San Francisco.

15 San Francisco joins the Tort Committee Opposition and further contends that any incentive
16 program should be designed to enhance safety and reliability and preserve funds for creditors, not
17 reward highly-compensated management employees who bear responsibility for the Debtors' financial
18 condition and poor safety track record.

19 San Francisco expressly reserves all rights to join in any other parties' objections to the
20 Motion.

21 CONCLUSION

22 For the reasons stated herein, San Francisco joins in the Tort Committee Opposition and
23 requests that the Court deny the Motion as set forth in this Joinder.

24 Respectfully submitted,

25 Dated: July 18, 2019

GREENE RADOVSKY MALONEY
SHARE & HENNIGH LLP

27 By: /s/ Edward Tredinnick

28 Edward J. Tredinnick
Attorneys for Creditor,
City and County of San Francisco